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6 Attorneys for Plaintiff,
GEORGIA-PACIFIC CONSUMER PRODUCTS LP
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
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11 GEORGIA-PACIFIC CONSUMER
PRODUCTS LP, a Delaware limited
12 partnership,

13 Plaintiff,

14 v.

15 LEE'S GENERAL TOYS, INC., a California
corporation; JOHN LEE, an individual;
16 DOES 1-100,

17 Defendants.
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Civil Action No. 07-CV-02390 JAH POR
DECLARATION OF ZHIJUN XU

1 I, ZHIJUN XU, hereby declare as follows:

2 a) I am the Director of the Intellectual Property Division of Shanghai Asia
3 Information Associates Limited Consultants ("AIAL"). I have personal knowledge of the
4 matters set forth below and could and would testify competently thereto if necessary.

5 b) Our company is an affiliate of the law firm of Baker & McKenzie, and I am
6 responsible for supervising investigation work instructed by Baker & McKenzie lawyers and
7 their clients.

8 c) I received instructions to investigate the following companies in particular to
9 confirm reports that they have previously engaged in the production and/or export of paper
10 products bearing the "ANGELITE" logo:

11 A. Zhongshan Runhui Paper Co. Ltd. (Chinese name: 中山市润晖纸业有限公司);

12 B. Shantou Kid Toys Co. Ltd (Chinese name: 汕头市启迪玩具有限公司);

13 d) On February 19, 2008, a member of my staff telephoned Zhongshan Runhui Paper
14 Co. Ltd. ("**Runhui**") and spoke with Ms. Zhang (Chinese surname: 张).

15 1) Ms. Zhang said that Runhui used to produce "Angelite" toilet paper for export
16 to the U.S. but stopped producing "Angelite" toilet paper due to the lack of orders.

17 2) She also said that Runhui is willing to produce "Angelite" toilet paper again
18 but only upon receiving a sizeable order, greater than a 40 foot container's worth.

19 3) Ms. Zhang admitted that she knew ANGEL SOFT was a famous brand for
20 toilet paper in the U.S.

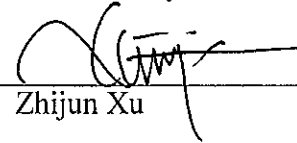
21 4) Ms. Zhang said that Runhui mostly produced toilet paper for export to the
22 western United States.

23 **B) Shantou Kid Toys Co. Ltd**

24 a) On February 13, 2008, a member of my staff telephoned Shantou Kid Toys Co.
25 Ltd. ("**Shantou Kid Toys**") and spoke with a man named Lin Hui Zhong (Chinese name:
26 林惠忠) who represented himself as a manager at Shantou Kid Toys.

27 b) Lin admitted to being aware of the ANGEL SOFT brand toilet paper in the United
28 States and said that he previously exported "Angelite" product to the United States.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct and that this declaration was executed by me on this 27th day of February 2008.

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4 
Zhijun Xu